

this was required to be done to meet formal requirements. The Applicant respectfully submits that they are unable to respond fully to the issue raised by the Examiner.

It is also respectfully submitted by the Applicant that the reference to cross related applications is in strict conformance with 37 CFR 1.125 (b). It is inappropriate to make this listing of the nature of an information disclosure statement or as an appendix in the specification. The Applicant also respectfully submits that it is contradictory to assert that the listing creates confusion in being not clear as to whether it does or doesn't add anything to the disclosure in that the Examiner readily and emphatically admits that none of the cited applications have been considered by the Examiner. It is indeed not possible to consider whether a document is or isn't relevant in a listing if the document has not been perused but it is a non sequitur to assert this creates confusion. Confusion requires the material to, at least, have been perused.

The Applicant respectfully requests reconsideration of this issue of the Office Action and in particular to enter the substitute specification filed 8 July 2002. Such references as proposed in the substitute specification have previously been entered for other co-related applications.

The Applicant further requests that this Action be made non-final in that the Examiner has not explained the substance of the objection whereby a response in full can be made and, moreover, the Examiner asserts that an IDS is appropriate for this aspect of the specification, an assertion which could have been made in the first Official Action.

The Applicant is given to understand that due to Item 1 in the Office Action whereby the substitute specification has not been entered, any other amendments proposed along with that substitute specification, in particular, to the claims, have also not been entered. The Examiner has not explained what the precise situation is, that is, the Examiner has not clearly specified this detail in the Office Summary or Action. The Applicant therefore is unclear as to how to respond to the Office Action in that it is not clear to the Applicant whether the last proposed amendments to the claims have been considered by the Examiner in reissuing objection to claims 1-4.

Whatever the situation is, the Applicant makes the following submissions. The Examiner continues to reject claims 1-4 and again cites Cane as an anticipation on the basis of novelty under 35 USC 102 (e). Again, the Applicant respectfully submits, that Cane does not disclose the combination of features defined in claim 1 relying on the claim as last proposed to be amended. As stated above, it is unclear to the Applicant what amendments, if any, have been considered in issuing the Office Action. Such amendments are again proposed in this response. The Applicant requests that the last proposed amendments be entered. Claim 1 includes a camera having a print media supply and print head internal to the camera, a portable power supply unit connected to that print head and a sensor and processing means for the image produced by the sensor in addition to a guillotine mechanism which cuts the print media into sheets of predetermined size. Cane, on the other hand, discloses separating print media into photographs by tearing along a serrated edge. The Examiner is referred to Figure 26 (b) at item 352 and its corresponding description. The word "guillotine" is not disclosed in Cane. A guillotine mechanism requires that the blade generally be of a particular shape, namely that the blade slopes, and that the blade mechanism moves in order to provide the cutting or severing action. Tearing along a serrated edge is not an equivalent action even though it may be asserted that it severs or cuts the print media into photograph sized sheets. So also does the use of a pair of scissors. The Applicant respectfully submits that the objection under 35 USC 102 (e) is improperly taken for this reason.

The previous amendments are again proposed with this response and requested to be entered in that as stated above the Applicant considers that the Examiner has rejected the previous submissions in toto.

With regard to the issue of double patenting over claim 1 of US Patent 6,152,619, the Examiner has not supported why it is obvious to substitute a guillotine mechanism for the motor and worm drive arrangement disclosed and claimed in said patent. For an issue of double patenting to survive it must be shown that any difference between the claims as currently claimed in the application are different from those of the cited patent except for matters obvious to the person skilled in the art. The Applicant respectfully requests the Examiner to support this assertion with suitable affidavit from their own personal knowledge or by citations whereby the obviousness of these assertions can be supported or challenged. The Examiner's argument appears to be that cutting print media appears to be